

III. REMARKS

Claims 1-8 are pending in this application. By this amendment, claims 1 and 5-8 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-8 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Alter, Steven; *Information Systems: A Management Perspective*, 2nd Edition, The Benjamin/Cummings Publishing Company, 1996 (hereafter “Alter”) in view of Ruffin (U.S. Patent No. 6,219,654), hereafter “Ruffin.” Applicants respectfully submit that the references cited by the Office do not teach or suggest each and every feature of the claimed invention. For example, with respect to independent claim 1, Applicants submit that the cited references fail to teach or suggest physically consolidating the IT sites of the geographic area to form a unique project geographic area for realizing the project business need by considering project cost parameters, distribution of the skilled people groups, and geographic site location peculiarities, which include cultural differences, language differences and legal constraints. The Office admits that Alter does not specifically teach this feature of the claimed invention. Instead, the Office relies on a passage in Ruffin that includes the single sentence “[a]lternatively, an enterprise may lend itself to islands of IT partitioned by geographic boundaries defined by campuses or by the consolidation of multiple data centers.” To this extent, Ruffin posits that data centers may be consolidated. However, Ruffin does not in any way indicate how this consolidation may be

accomplished. Further, Ruffin does not indicate the need to take into account a particular business project need, taking into account the costs, people involved and cultural considerations.

The Office indicates that it would have been obvious to flesh out the suggestion of Ruffin with the Information System Planning of Alter. However, Alter does not envision consolidation of sites but rather only the deploying of information systems resources among existing sites. As such, the outcome of applying the methods of Alter to the suggestion of Ruffin to consolidate, is far from certain. Accordingly, not only do the references not teach or suggest the multiple building block approach for consolidating sites to form a unique project geographic area, there is no motivation or suggestion for combining the references. Accordingly, Applicants respectfully request that the rejection be withdrawn.

With respect to dependent claim 3, Applicants respectfully submit that the cited references also fail to teach or suggest entering in a database the values of said criteria; creating with a graphic user interface an evolutionary image of the values of the criteria; and analyzing the image for determining the best processes and methods. The Office admits that Alter fails to explicitly teach this limitation, but instead states that this teaching is old and well-known. Applicants respectfully object to this use of unsubstantiated factual statements in support of its rejections this and other claims. Rather, Applicants respectfully submit that use of a database and graphical user interface for collection of values, creation of an evolutionary image of the values and analysis of the evolutionary image is not old and well know, especially in the area of standardizing methods and processes prior to consolidation of sites. Accordingly, Applicants respectfully request that the Office withdraw its rejection or provide references that support its assertions.

With to the Office's other rejections with respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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